



## Maricopa County Risk Management

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July 8, 2019

**VIA E-MAIL:** mro@azica.gov and Jacqueline.Kurth@azica.gov

Jacqueline Kurth, Manager and  
Commissioners of the Industrial Commission of Arizona  
Industrial Commission of Arizona  
800 W Washington St.  
Phoenix, AZ 85004

Re: Proposed Pharmaceutical Fee Schedule

Dear Ms. Kurth and Commissioners of the Industrial Commission of Arizona:

Maricopa County Risk Management, a Self-Insured and Self-Administered Worker's Compensation employer for more than 13,000 employees in Maricopa County, would like to submit this letter in support of the proposed 2019-2020 Pharmaceutical Fee Schedule ("PFS").

Like many other employers in Arizona, Maricopa County works diligently to control the rising costs of worker's compensation claims. We recognize the proposed PFS as an opportunity for Maricopa County, and other Arizona employers, to have an ability to contain the costs currently incurred due to certain physicians dispensing medications at significantly inflated prices.

We also recognize that the current practice of physician dispensing can raise a serious conflict of interest and ethical issues. When a physician can dispense a medication at a profit, it can be unclear whether that medication has been selected as the best, most effective medication to treat an injured worker, or because it generates the highest profit for the physician treating an injured worker. Incentives should be removed from the process of selecting and prescribing medications, and the proposed changes to the fee schedule do not take away the physicians ability to treat the patient as they see appropriate. The potential of profiting from prescription writing must be eliminated.

Maricopa County spent in excess of \$190,000 in taxpayers' dollars for prescription medication from July 1, 2018 through May 31, 2019. The proposed PFS will provide for cost saving and cost containment while also ensuring that our injured workers continue to receive the necessary and appropriate medications they need to recover from their industrial injuries.

Regards,

A handwritten signature in cursive script that reads "Liane Yeager".

Liane Yeager  
Director, Risk Management  
Maricopa County